



CITY OF DUNKIRK
DEPARTMENT OF PUBLIC WORKS
CITY HALL, DUNKIRK, N. Y. 14048

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MAYOR
366-0452

DAVID J. MANZELLA
DIRECTOR OF PUBLIC WORKS
366-3755

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March 30, 1993

Ms. Donna Searcy,
Secretary
Federal Communications Commission
1919 M Street, NW
Room 222
Washington, D. C. 20554


RE: PR DOCKET NO. 92-235
OPPOSITION TO ~~DOCKET~~

Dear Ms. Searcy:

As an end user of public safety and/or special emergency frequencies, I would like to voice my opposition to "spectrum refarming", as outlined in Notice of Proposed Rule Making #92-235. While public safety interests are unique from other spectrum users due to the public safety considerations, this distinction is not addressed in this proposal. Some major points of concern are listed below:

The possibility of having to replace existing equipment and expand the number of transmitter sites puts a tremendous fiscal burden on the governmental entities. These agencies cannot expect to bear this extra financial burden in this time of budget cutbacks.

Power limitations based on height above average terrain and fifty mile separations are not practical in public safety



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Technical standards necessary to support this proposal do not address a cost effective method of modifying existing equipment. There is evidence of problems with poor voice quality, tone squelch decoding, data transmission, and tone signaling. Tone signaling is the main method of alerting in public safety communications and replacement of existing equipment would be financially prohibitive.

Considering the many financial and technical reasons for the public safety community to oppose these regulations, and the potential compromise of the publics' safety, I request that the Commission withdraw this Notice of Proposed Rule Making #92-235.

Sincerely,

A handwritten signature in dark ink, appearing to read "David J. Manzella", written over a horizontal dashed line.

David J. Manzella
Director of Public Works
CITY OF DUNKIRK, NEW YORK

DJM:bz